

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**FILED**

2014 DEC 19 P 4: 01

U.S. BANKRUPTCY COURT  
E.D. MICHIGAN-DETROIT

CARL WILLIAMS, HASSAN ALEEM AND  
DOROTHEA HARRIS

Creditors/Objectors,

v

In re:  
City OF DETROIT, MICHIGAN  
AND EMERGENCY MANAGER  
KEVYN D. ORR

Chapter 9  
Case No. 13-53846  
Judge Steven W Rhodes

Debtor/City of Detroit

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**RECONSIDERATION OF A REHEARING ON THE STAY ON  
APPEAL AND MEMORANDUM AND LAW IN SUPPORT**

Petitioners, Carl Williams, Hassan Aleem and Dorothea Harris moves the court for hearing and/or rehearing on the Stay on appeal in this case. A so-called imitation of a hearing was held without any sworn testimony. The petitioners were not allowed to be heard, thus a violation of 1<sup>st</sup> Amendment right to free speech and right to a meaningful hearing and 5<sup>TH</sup> Amendment procedure due process and the 14<sup>th</sup> Amendment of equal protection of the law Petitioners

Williams got up to go up front to speak and the guard told him to sit down. He raised his hand and the judge completely ignored him as a result none of the pro se petitioners who all happen to be Black/ Afro American was completely ignored. And not only procedure due process but overtly discriminatory as well.

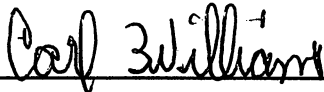
The Supreme Court has ruled in *Goldberg v. Kelly*, 387 U.S. 254 90 S Ct 1011, 252, at 267-268, (1970), that fundamental requisite of due process of law is that a person receives “**timely and adequate notice**” *Goldberg v Kelly supra*, citing *Armstrong v Manzo*, 380 U.S. 545 (1965). And the fundamental requisite of due process of law is “**the opportunity to be heard**” citing *Grannis v. Ordean*, 234 U.S. 385, 394 (1914). (See Motion for Reconsideration and hearing filed December 15, 2014.)

For the record we have file numerous objections and have yet to receive hearing as required. Petitioner have not had a fair and meaningful hearing and the court have acted arbitrary and capricious to deny them a meaningful hearing. It is procedural due process that is our fundamental guarantee of fairness, our protection against arbitrary, capricious and unreasonable government action *Board of Regents v Roth* 408 U.S. 564, 589 (1972).

WHEREFORE the above facts and law we submitted this request for  
Reconsideration for Rehearing on the stay of appeal.

**SEE Notice Attached**

I/We hereby certify that the statements made herein are true and correct to the best of my knowledge and belief, under penalty of perjury and contempt of Court under the laws of the United States of America.



\_\_\_\_\_  
Carl Williams  
10112 Somerset  
Detroit, Michigan 48224  
313 521-5012



\_\_\_\_\_  
Hassan Aleem  
2440 Taylor  
Detroit, Michigan 48206  
313 205-4353

\_\_\_\_\_  
Dorothea Harris  
20552 Huntington  
Detroit, Michigan 48225  
313-221-0707

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**NOTICE OF HEARING FOR THE RECONSIDERATION  
AND REHEARING ON THE STAY ON APPEAL**

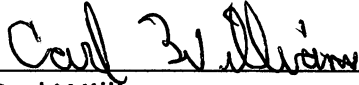
Petitioners, Carl Williams, Hassan Aleem and Dorothea Harris moves the  
court for hearing and/or rehearing on the Stay on appeal hereby demand a hearing.

A so-called imitation of a hearing was held without any sworn testimony once again,

Therefore we request a hearing on \_\_\_\_\_ day at the time \_\_\_\_\_ and place

would be at Room \_\_\_\_\_ first floor 211West Fort Street, Detroit Michigan 48226.

I/We hereby certify that the statements made herein are true and correct to the best of my knowledge and belief, under penalty of perjury and contempt of Court under the laws of the United States of America.




Carl Williams

10112 Somerset

Detroit, Michigan 48224

313 521-5012



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Chapter 9  
Case No. 13-53846  
Judge Steven W Rhodes

Case No. 14-cv-10434  
Hon. Bernard A. Freidman  
Magistrate Paul J. Komives

**PROOF OF SERVICES**

Carl Williams, being first duly sworn deposes and  
your name

Say that on December 19 2014. I sent a copy of Memorandum and law in  
support of Notice of Motion for Reconsideration for rehearing , Upon the con-  
cern parties by certified mail at the following address:

City of Detroit  
Corporation Council  
First National Building  
600 Woodward Ave  
Detroit, Michigan 48226

Emergency Manager  
Kenyn Orr  
Coleman A Young Municipal Center  
2 Woodward 11th floor  
Detroit, Michigan 48226

I/We hereby certify that the statements made herein are true and correct to the best of my knowledge and belief, under penalty of perjury and contempt of Court under the laws of the United States of America.

Sign Carl Williams

Dated December 19, 2014